

THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

ANNA CHIMANSKI, *et., al.*,

Case No. 17-CV-4306

Plaintiff

vs.

HON. AMY J. ST.EVE

FRONTIER AIRLINES INC

Defendant

**NOTICE OF PLAINTIFF'S MOTION TO STRIKE AFFIRMATIVE DEFENSES
PURSUANT TO RULE 12(f)(2) OF FED. R. CIV. PROCEDURE**

TO: Honorable Amy J. St.Eve.
Everett McKinley Dirksen Building
Courtroom 1241 | Chambers 1260
219 South Dearborn Street
Chicago, Illinois 60604

TO: Emmett Michael Shaughnessy, Esq
Adler Murphy & McQuillen LLP.
20 S. Clark Street, Suite 2500,
Chicago, Illinois 60603

Please take notice that on 7th day of September 2017 at 9:00 A.M. or as thereafter directed by this Honorable Court the undersigned counsel will appear before the Honorable John J. Tharp, Jr in the United States District Court for Northern District of Illinois, Room 1419, located at: 219 South Dearborn Street, Chicago, Illinois 60604 and present the following motion: **Plaintiff's Motion to Strike Affirmative Defenses pursuant to the Rule 12(f)(2) of Fed. R. Civil Procedure**. This Notice is duly served upon you pursuant to LR 5.4 and 5.5.

Dated this Notice of Motion on this 28th day of August 2017.

Respectfully submitted by:
GOROKHOVSKY LAW OFFICES, LLC
Attorneys for Plaintiffs

BY: Vladimir Gorokhovsky, Esq.

/s/Vladimir Gorokhovsky, LL.M.
ILND TR. 10994

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NORTHERN DISTRICT OF ILLINOIS**

ANNA CHIMANSKI, et., al.,

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Plaintiff

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**CERTIFICATE OF SERVICE OF
PLAINTIFF'S MOTION TO STRIKE AFFIRMATIVE DEFENSES PURSUANT
TO RULE 12(f)(2) OF FED. R. CIV. PROCEDURE**

Under penalties as provided by law and pursuant to Local Rule 5.4 and 5.5 (b) the undersigned counsel of record for the above-named plaintiff hereby certifies that the within pleadings were served via CM/ECF upon defendant's counsel, Attorney Emmett Michael Shaughnessy of Adler Murphy & McQuillen, 20 S. Clark Street, Suite 2500, Chicago, Illinois 60603 on August 28, 2017.

Dated this Notice on this 28th day of August 2017.

Respectfully submitted by:

GOROKHOVSKY LAW OFFICES, LLC
Attorneys for Plaintiffs

BY: Vladimir Gorokhovsky, Esq
/s/Vladimir Gorokhovsky, LL.M.
ILND TR. 10994

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